

Eileen S. Stommes  
Deputy Administrator  
USDA-AMS-TM-NOP  
Room 4007-S, Ag Stop 0275  
P.O. Box 96456  
Washington, D.C. 20090-6456

Dear Eileen S. Stommes,

I am writing to express my concern about the proposed USDA organic standards (docket number TMD-94-00-20). I am a consumer of organic products and feel very strongly that the standards proposed are a potential health hazard to people consuming organic products. The reason I started buying organic foods in the first place was to stir clear of the very farm practices that the USDA proposed national organic standards now applauds. I totally agree with Katherine DiMatteo, executive director of for the Organic Trade Association (OTA), when she stated, "We strongly believe that the Proposed Rule is not compatible or consistent with current organic practices. We fervently believe that the current draft of the regulations 'lowers the standard' for organic and is unacceptable as written." I will briefly summarize my perspective on this issue as I know you are interested in hearing from the consumers of organic products.

First I believe that the proposed rules have totally missed the point of organic standards as they apply to organic consumers and the general public. (The organic industry is growing by approximately 20% a year.) The proposed rules take a reductionist approach to organic food production that eliminates key concepts such as the health of the agro-ecosystem and biodiversity on the farm. Organic farming is a whole way of thinking that requires awareness of all that we do always seeking to benefit the total picture, the plants, animals, Earth, and the community.

Second it is as if the National Organic Standards Boards (NOSB) recommendations have been totally ignored. We trust the NOSB to stand up for the optimum organic farming practices. On top of that the NOSB has clearly mandated authority, given in the Organic Foods Production Act of 1990, to recommend the National List of Materials for organic practices. The USDA undermines the NOSB's authority blatantly in this draft of the proposed regulations.

Third I'll refer to page 65875 of the Federal Register, Volume 62, # 241 (Dec. 16 1997) on Genetically Engineered Organisms (GEOs, AKA biotechnology or genetically modified organisms). I want to be clear that GEOs and their products could not be created in nature, and that there is not yet enough scientific information available to judge what long-term impacts GEOs and their products would have on the environment and our families. This is an unproven technology that the organic system does not need or want in order to grow high quality and nutritious food. They already do that. Furthermore I have the right to make a choice in the market place. I want to know that the organic label means no use of GEOs.

Fourth I'll refer to page 65884 of the Federal Register, Volume 62, # 241 (Dec. 16, 1997) on ionizing radiation (AKA irradiation). Ionizing radiation is not compatible with a system of organic farming or handling. The organic industry already has effective alternatives to ionizing radiation, such as simple sanitary practices. These sanitary practices are already being used quite successfully and are compatible with a system of organic farming and handling. Ionizing radiation is a completely synthetic process and has never been allowed in organic food production. Furthermore we do not know the long term affects of irradiation and it is not a remedy to food safety concerns. I do not believe that ionizing radiation should be considered an standard industry practice. I want the freedom to make a choice when I go to the store and the organic label should mean no use of ionizing radiation.

Fifth I'll refer to page 65892-65893 of the Federal Register, Volume 62, # 241 (Dec. 16 1997) on biosolids (AKA toxic sludge or municipal sludge). I want to be clear that I want biosolids to be absolutely prohibited in organic production because the long-term impact on the environment and human health is unknown at this time. Sewage sludge from municipalities' waste may contain heavy metals and toxins and, therefore, is not appropriate for use on land where food is to be grown for human consumption. The use of this sludge has never been allowed in organic food production and is completely unnecessary. I again deserve the right and freedom to make choices at the market place. I want the organic label to mean no use of biosolids.

There are many other problems I found in the proposal including, a weak livestock section, unnecessary loopholes, weakened de-certification authority, and the ignoring of land usage practices. Basically I ask that the USDA adhere to the NOSB recommendations, complete the comment period and then rewrite the proposed rules and resubmit a second set of proposed regulations (that are in keeping with the recommendations by the NOSB) for a second public comment period.

Thank you for considering the concerns I have shared. I will be waiting to hear where we go from here.